

EXHIBIT A

Brass, Rachel S.

From: Brass, Rachel S.
Sent: Tuesday, January 25, 2022 3:35 PM
To: Keith Mathews; mkernan@kernanlaw.net
Subject: RE: Case 3:21-cv-05567-EMC Coronavirus Reporter et al v. Apple Inc./Sanctions Motions
Attachments: Caller ID; Re: Amended Primary Productions Complaint ; Re: 3:21-cv-05567-EMC Coronavirus Reporter et al v. Apple Inc. et al; Re: Default

Mr. Mathews,

Do you or do you not represent Jeffrey Isaacs in any way relevant to this case? On no fewer than four occasions, you have told us in relation to this case that Mr. Isaacs is your “client”—both before and after Mr. Isaacs purported to begin proceeding *pro se*. Some of those emails are attached. Mr. Isaacs is also clearly your client as the CEO—and, as far as public records reveal, sole executive—of at least one entity that you represent in this case. Based on these facts—which include your repeated representations as an officer of the Court—we could not have, and have not, communicated with Mr. Isaacs. Your claim now that you do not represent Mr. Isaacs is not only an unexplained about-face but also puts us in the precise ethical quandary presented by hybrid representation that we have repeatedly raised with you and the Court.

Unless you provide a response to our question about whether Plaintiffs oppose Apple’s motion, we will be forced to raise again the problems posed by Mr. Isaacs’ hybrid representation in our Rule 7-11 statement.

Respectfully,
Rachel

Rachel S. Brass
Partner

GIBSON DUNN

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From: Keith Mathews <Keith@aaone.law>
Sent: Tuesday, January 25, 2022 2:21 PM
To: Brass, Rachel S. <RBrass@gibsondunn.com>; mkernan@kernanlaw.net
Subject: Re: Case 3:21-cv-05567-EMC Coronavirus Reporter et al v. Apple Inc./Sanctions Motions

[WARNING: External Email]

Rachel,

Just a reminder I do not represent Dr. Isaacs and am not authorized to respond on this issue.

Thanks,

Keith

On 1/25/2022 12:45 PM, Brass, Rachel S. wrote:

Dear Mr. Mathews and Mr. Kernan,

We are in receipt of Isaacs' two sanctions motions. Because neither motion complies with Local Rule 7-8(d), Apple will move for summary denial. In addition, Apple intends to ask the Court for a single response date to both motions, should a response be required, two weeks following any order denying Apple's motion. Please let us know if you will stipulate to Apple's requests.

Best,
Rachel

Rachel S. Brass
Partner

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